

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Chapter 11 V
Industrial Food Truck, LLC

(DEBTOR) Bankruptcy No. 20-13275AMC11V

**OBJECTION TO CLAIM #11 KIAMICHI TECHNOLOGY CENTER
SCHOOL DISTRICT NO. 7**

1. Debtor filed for protection under Chapter 11 V on August 7, 2020.
2. Jami Nimeroff was appointed as Chapter 11 V Trustee.
3. Creditor, Kiamichi Technology Center School District No. 7 filed a proof of claim as a general unsecured claim for \$113,640.10. Exhibit A.
4. Said claim was derived from a contract for a food truck fabrication.
5. Debtor is approximately eighty (80) percent done with the project.
6. Debtor's performance was interrupted by the Pandemic and closure for five (5) months.
7. Debtor is in possession of the truck.
8. Debtor is entitled to be compensated for the work completed.
9. Debtor is ready, willing and able to complete the project.

WHEREFORE, Debtor prays that this Honorable Court enter an order denying the claim or reducing it to an amount the court deems fair and just.

Respectfully submitted,

Date: October 13, 2020

BY: /s/ Michael A. Cataldo
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